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Attorneys for Defendant Urban Outfitters Wholesale, Inc.  
d/b/a Anthropologie

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA – OAKLAND DIVISION

ALEXANDER MOORE, individually,  
and on behalf of other members of the  
general public similarly situated,

Plaintiff,

vs.

URBAN OUTFITTERS WHOLESALE,  
INC., D/B/A ANTHROPOLOGIE, a  
Pennsylvania corporation; and DOES 1  
through 10, inclusive,

Defendants.

Case No.: CV 13-2245-JSW

Related Case Nos.: 13-cv-02628-JSW;  
13-cv-03184-JSW; 14-cv-00024-JSW;  
14-cv-01580-JSW; 14-002601-JSW

[Assigned to Hon. Jeffrey S. White]

**STIPULATION PERMITTING  
PLAINTIFF TO FILE FIRST  
AMENDED COMPLAINT AND  
TAKING OFF CALENDAR  
PLAINTIFF'S PENDING MOTION  
FOR LEAVE TO AMEND  
AND ORDER THEREON**

Hearing on Plaintiff's Motion for Leave

Date: August 7, 2015

Time: 9:00 a.m.

Place: Courtroom 5

Complaint Filed: June 4, 2013

Removed: August 2, 2013

1 Plaintiff Alexander Moore and Defendant Urban Outfitters Wholesale, Inc.  
2 d/b/a Anthropologie (collectively, the “Parties”), by and through their respective counsel  
3 of record, stipulate and agree as follows:

4 **WHEREAS**, on June 23, 2015, Plaintiff filed his Motion for Leave to File First  
5 Amended Complaint (“Motion for Leave”), seeking to add an additional plaintiff to the  
6 action, a claim under the Private Attorneys General Act of 2004, Cal. Labor Code  
7 sections 2698, et seq. (“PAGA”), a claim for forfeiture of vacation pay, and other  
8 amendments to clarify his claims;

9 **WHEREAS**, Plaintiff’s Motion for Leave is fully briefed and scheduled to be  
10 heard on August 7, 2015;

11 **WHEREAS**, on July 31, 2015, the Parties reached a tentative settlement that  
12 was put on the record;

13 **WHEREAS**, in the interest of judicial efficiency and economy of resources and  
14 in light of having reached a tentative settlement, the Parties hereby **STIPULATE AND**  
15 **AGREE** and respectfully request that Plaintiff be permitted to file his First Amended  
16 Complaint.<sup>1</sup> The Parties also **STIPULATE and AGREE** and respectfully request that  
17 Defendant’s deadline to respond to the First Amended Complaint be stayed in light of  
18 the pending settlement. The Parties further **STIPULATE and AGREE** and  
19 respectfully request that the August 7, 2015 hearing on Plaintiff’s Motion for Leave be  
20 taken off calendar.

21 **IT IS SO STIPULATED.**

22  
23  
24  
25  
26  
27 <sup>1</sup> Doc. 114–1, Exh. A (First Amended Class Action Complaint & Enforcement  
28 Under the Private Attorneys General Act, California Labor Code §§ Et. Seq.).

1 Dated: August 5, 2015

Respectfully submitted,

2 Capstone Law APC

3  
4 By: /s/ Raul Perez

5 Raul Perez  
6 Melissa Grant  
7 Arnab Banerjee  
8 Suzy E. Lee

Attorneys for Plaintiff Alexander Moore

9 Dated: August 5, 2015

Respectfully submitted,

10 DRINKER BIDDLE & REATH LLP

11  
12 By: /s/ Jaime D. Walter

13 Cheryl D. Orr  
14 Jaime D. Walter

15 Attorneys for Defendant Urban Outfitters  
16 Wholesale, Inc. d/b/a Anthropologie

17 **Attestation Pursuant to Local Rule 5.1(i)**

18 Pursuant to Local Rule 5.1(i), I, Jaime D. Walter, hereby attest that I have obtained  
19 concurrence in the filing of this document from all other signatories to this document.

20 I declare under penalty of perjury under the law of the United States of America that the  
21 foregoing is true and correct. Executed on August 5, 2015, in San Francisco, California.

22 /s/ Jaime D. Walter  
23 Jaime D. Walter

24 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

25  
26 Dated: August 5, 2015

27   
28 THE HONORABLE JEFFREY S. WHITE

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